

# EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**SPIN SCREEN, INC.,**

***Plaintiff,***

**v.**

**KINO-MO LTD., d/b/a HYPERVSN and  
YOONGLI LLC,**

***Defendants.***

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**CASE NO. 6:25-CV-00189-**

**DECLARATION OF ARTSIOM STAVENKA**

I, Artsiom Stavenka, declare as follows:

1. My name is Artsiom Stavenka. I am over the age of twenty-one (21), of sound mind, and capable of and authorized to make this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.
2. This declaration is submitted in support of Kino-Mo's Motion to Dismiss for lack of personal jurisdiction and for improper venue.
3. Defendant Kino-Mo Ltd. ("Kino-Mo") is an entity formed under the laws of England and Wales, Registration No. 07517352. I am a director for Kino-Mo and have held this position from 2023 since my last appointment.
4. I work from the London office of the company.
5. Kino-Mo does not have any permanent employees located in the United States but sometimes hires external consultants on a contract basis. Kino-Mo has no external consultants in the state of Texas and particularly not in the Western District of Texas.

6. Neither I nor any employees of Kino-Mo had heard of Spin Screen or the patents that are subject to this action before we were notified of its filing.

7. The complaint filed on May 7, 2025, by Spin Screen, Inc. alleges that Kino-Mo “trades out of a warehouse located at 7140 Westy Sam Houston Parkway, Houston, Texas 77040.” Complaint, D.I. 1 at ¶ 2. This statement is not true.

8. Kino-Mo used to lease a warehouse in Texas but later moved it to Nevada. Such warehouses are used to house products that were shipped to other states when a customer would rent products for events, or when Kino-Mo would attend trade shows. The location in Texas stopped working as such warehouse since November 2023.

9. Today, Kino-Mo has only one warehouse which is located in Nevada. The Nevada warehouse is used and functions in the way as the Texas warehouse in that it houses products for rent or for sale that are shipped from the warehouse.

10. To my knowledge, neither Kino-Mo nor its resellers has attended a trade show in the State of Texas in the last 2 years.

11. Kino-Mo has no real estate, offices, phone listings, bank accounts or any other presence in the State of Texas.

12. Kino-Mo sells its products through the Internet and through resellers. The defendant

Yoongli LLC used to be a reseller of Kino-Mo's products, but its authorization for reselling was terminated in 2021.

13. Spin Screen's complaint falsely alleges that Yoongli LLC is Hypervsn's "Texas-based retailer." *Id.*, at ¶ 5. Yoongli and Kino-Mo have not had a relationship of any kind since 2021. Spin Screen also falsely states that Hypervsn has had actual notice of the infringement allegations. *Id.* at ¶ 6. Kino-Mo (or Hypervsn, its "dba") has had no actual or constructive notice of this lawsuit.

14. Presently, Kino-Mo has resellers in Pennsylvania, Ohio, Utah, Colorado, Virginia, Oregon, Georgia, California, Maryland and Florida.

15. Prior to the filing of this lawsuit, Kino-Mo was not contacted by Spin Screen to inquire about our presence or lack of presence in Texas. Had they done so, they would have been informed that Kino-Mo does not have a warehouse or a distributor in Texas.

16. Kino-Mo is not registered to do business in Texas and holds no other registrations, certifications or approvals to do business locally in any city, town or other governmental divisions located in Texas.

17. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

**Executed September 22, 2025**



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**Artsiom Stavenka**